



July 10, 2024

The Honorable Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

BY ECF

**Re: *In re Terrorist Attacks on September 11, 2001*, No. 1:03-md-01570 (S.D.N.Y.)**

Dear Judge Netburn:

We respectfully write on behalf of Defendants Muslim World League (“MWL”), International Islamic Relief Organization (“IIRO”), World Assembly of Muslim Youth (“WAMY”), Dr. Adnan Basha, Dr. Abdullah Al-Turki, Dr. Abdullah Al-Obaid, and Dr. Abdullah Naseef (collectively, the “Objecting Defendants”) to advise the Court that these defendants join in the letter filed by the Kingdom of Saudi Arabia on July 10, 2024 insofar as that letter addresses documents that Plaintiffs have filed but not cited (or improperly cited) and deposition transcripts Plaintiffs have filed in their entirety but cited only in part.<sup>1</sup> We also note that, when filing the deposition transcripts, Plaintiffs omitted the respective errata sheets with the deposition transcripts, which sheets contain numerous corrections to significant translation and transcription errors.

The Objecting Defendants therefore join in the Kingdom of Saudi Arabia’s: (1) argument that the documents that Plaintiffs have filed but not cited (or improperly cited) remain subject to the protective orders in this case and (2) request that the Court direct the parties to file publicly only those portions of depositions that are properly cited in the parties’ briefs, averments, or responses, with appropriate redactions. The Objecting Defendants also request that the Court direct the parties to attach publicly those portions of the errata sheets that correspond with the cited portions of those deposition transcripts filed publicly to ensure that the transcripts accurately reflect the deponents’ testimonies.<sup>2</sup>

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<sup>1</sup> Plaintiffs have filed the entire deposition transcripts of Drs. Basha, Al-Obaid, and Al-Turki and of Dr. Saleh Al-Wohaibi and Mr. Ibrahim Abdullah. Dr. Basha served as Secretary General of the IIRO. Drs. Al-Obaid and Al-Turki served as Secretaries General of MWL. Dr. Saleh Al-Wohaibi serves as the Secretary General of WAMY, and Mr. Ibrahim Abdullah served as the head of WAMY International.

<sup>2</sup> As noted above, Plaintiffs have improperly filed entire deposition transcripts under seal without corresponding errata sheets. As to those portions of the deposition transcripts that are not cited and



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We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Aisha E. R. Bembry

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therefore should not be filed publicly, Plaintiffs should also be directed to file the corresponding errata sheets in their entirety under seal.



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/s/ Omar T. Mohammedi

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/s/ Alan Kabat

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Cc: All counsel of record by ECF